

Statement of Basis
for
Modification of Permit No. ST 6167
Weyerhaeuser Raymond Lumber Mill, Raymond, WA.
July 2002

Ecology issued this permit on January 23, 2002 and it became effective March 1, 2002. Weyerhaeuser filed an appeal of this permit on February 15, 2002 (PCHB NO. 02-025), citing, in part, the following: unreasonable and inappropriate monitoring requirements for BOD and TSS; S10, the Compliance Schedule for Monitoring Equipment Installation was inappropriate and unreasonable, and did not allow enough time; and “the cost to comply with these requirements is needlessly great...”.

The appeal was complicated by the pending submittal of an engineering report. By state law, Weyerhaeuser was required to submit an engineering report to evaluate the best location and appropriate equipment to locate a flow meter and composite sampler. Weyerhaeuser was reluctant to submit the engineering report, since they believed the outcome was already known: the best location for the new equipment was at a manhole on First Street. Based on Weyerhaeuser’s assurance and a desire to settle the appeal, Ecology signed Joint Stipulation Regarding Settlement and Order Dismissing Appeal for PCHB NO. 02-025, on June 6th, 2002. In the meantime, Weyerhaeuser submitted the required engineering report on May 1, 2002, but Ecology returned it as fundamentally deficient. This incomplete report concluded that the best location for the flow meter and composite sampler was the First Street location (proposed Outfall 003). After rejection of the first engineering report, Weyerhaeuser procured the services of an experienced engineering firm. Ecology granted Weyerhaeuser’s request for a time extension, and a new engineering report was submitted on June 12, 2002. Ecology found that this submittal met the regulatory requirements and was therefore approved on July 2, 2002. However, this second engineering report concluded that the best location for the new equipment had changed back to the existing Outfall 002 location on plant property, as designated in the permit issued in January. Therefore, Ecology had a conflict: the legal obligation to modify the permit as required by the settlement order, but Weyerhaeuser’s request to use the location recommended in their engineering report. To correct this conflict, a second order was drafted by Weyerhaeuser’s legal counsel and was signed on July 12, 2002. This order amended the first order, and allowed Ecology to modify the permit the way Weyerhaeuser wanted it, as now reflected by this modification.

Ecology and Weyerhaeuser agreed to settle the appeal by making the following changes to the permit. First, the monitoring frequency for oil & grease, temperature, and ammonia are reduced (BOD and TSS remain the same). Second, some changes are made to the compliance schedule for installation of the new flow meter and composite sampler. Specifically, elements 3 & 4 of S10 are changed from hard dates, to now reflect time periods for completion of the respective elements: 60 days and 90 days, respectively, from approval of the engineering report.

Based on the agreed order, the monitoring frequency for ammonia and oil & grease is changed from once per week to once every other week. The frequency for temperature measurement is changed from once per week to once per month. The reductions in monitoring frequency for these parameters, and the extension to the compliance schedule for the monitoring equipment, are not expected to significantly affect the ability of Ecology and the City of Raymond to assess compliance with the permit and the effects of Weyerhaeuser’s discharge on Raymond’s treatment plant. With this information, Ecology and the City will be better able to assess the impact of Weyerhaeuser’s discharge to the City’s treatment system, and to enact an appropriate cost recovery mechanism for that treatment.